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10 Attorney for Defendant
11 GABRIEL ERASMO CABRERA

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

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17 UNITED STATES OF AMERICA,
18 Plaintiff,
19 v.
20 GABRIEL ERASMO CABRERA,
21 Defendant.

22) Case No. 2:25-cr-00130-JAM
23)
24) **STIPULATION AND ORDER TO**
25) **CONTINUE STATUS CONFERENCE, TO**
26) **CONVERT STATUS CONFERENCE TO**
27) **CHANGE OF PLEA HEARING ON**
28) **SEPTEMBER 23, 2025, AND EXCLUDE**
1) **TIME**
2)
3) Judge: Hon. John A. Mendez
4)
5)

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8 GABRIEL ERASMO CABRERA, by and through his attorney of record, Assistant
9 Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of
10 record, Douglas Harman, hereby stipulate to and request an order from this Court converting the
11 status conference in this matter to a change of plea, and continuing the hearing from August 5,
12 2025, at 9:00 a.m. to September 23, 2025, at 9:00 a.m.

13 Mr. Cabrera has graduated from the WestCare residential drug treatment program in
14 Fresno, CA and is working diligently with his counsel to complete a review of his discovery in
15 his two pending cases¹. The government and defense have reached an agreement regarding the
16 terms of a resolution in both matters, and have determined that September 23, 2025 is a mutually
17 convenient date for a change of plea, which will allow for a completion of discovery review prior
18 to trial.

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28 ¹ Mr. Cabrera is charged separately in the instant case, as well as in case number 2:25-cr-00033-JAM.

1 to the hearing date. Therefore, the parties respectfully request to convert the status conference to
2 a change of plea hearing, and schedule it for September 23, 2025, at 9:00 a.m. The parties also
3 jointly move that the court excludes time between August 5, 2025 and September 23, 2025
4 pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a
5 continuance granted by the Court at defendant's request on the basis of the Court's finding that
6 the ends of justice served by taking such action outweigh the best interest of the public and the
7 defendant in a speedy trial.

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Dated: July 28, 2025

Respectfully submitted,

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HEATHER E. WILLIAMS
Federal Public Defender

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/s/ Megan T. Hopkins
MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for Defendant
Gabriel Erasmo Cabrera

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KIMBERLY A. SANCHEZ
Acting United States Attorney

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DATED: July 28, 2025

/s/ J. Douglas Harman
J. DOUGLAS HARMAN
Assistant United States Attorney
Attorney for Plaintiff

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8 Based on the stipulation of the parties, the August 05, 2025 status conference is
9 **CONTINUED and CONVERTED to a change of plea hearing on September 23, 2025, at**
10 **9:00 a.m.** Time is **EXCLUDED** between August 05, 2025, and September 23, 2025, as
11 described in the parties' Stipulation.
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2 IT IS SO ORDERED.
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Dated: July 28, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE